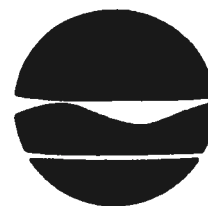


**New York State Department of Environmental Conservation**  
Region 3  
21 South Putt Corners Road  
New Paltz, NY 12561-1696  
914-255-5453



**Thomas C. Jorling**  
Commissioner

June 28, 1991

Doug Grimmer  
Baker Properties  
485 Washington Ave  
Pleasantville, NY 10570

Subject: Magna Metals # 360003

Dear Mr. Grimmer,

As you requested, here is the draft Workplan for the Field Sampling to be conducted at your facility. This is part of a Remedial Investigation/Feasibility Study planned for the site. The Department's comments are enclosed. The final draft has not been received from Ebasco.

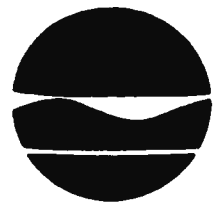
Please feel free to call with any questions you have regarding the workplan.

Sincerely,  
*Molly Gallagher*  
Molly Gallagher  
Hazardous Waste Remediation

cc: Rosalie Rusinko  
John Henkes

BCLP04903

New York State Department of Environmental Conservation  
Region 3  
21 South Platt Corners Road  
New Paltz, NY 12561-1696  
914-255-5453



Thomas C. Jorling  
Commissioner

May 21, 1991

Les Skoski  
Ebasco Environmental  
160 Chubb Ave  
Lyndhurst, NJ 07071  
Re: Magna Metals Site # 360003

Dear Mr. Skoski,

I enclose the following comments on the proposed Field Sampling Plan for the RI/FS activities at the subject site.

To summarize our proceedings thus far:

At our original meeting at this site we discussed the idea of an initial "screening" sampling round to up-date our information and determine the scope of the RI. Due to the ongoing consent order's specification that an RI Workplan be approved prior to its signing, review of current data, and your preference to conduct surface sampling simultaneously with well drilling, we have expanded the scope of this sampling plan so that it will serve as the Field Sampling Plan called for in the RI. This changes the purpose from "screening" to "defining the extent of contamination".

Field Sampling Plan

1-7 Although general history can be put into the RI report, sampling history and all sampling results are essential as they are the foundation of the FSP. Type of waste disposed and all 1978, and some 1983 & 1984 sampling results are missing. It should be noted that leach pits (excluding septic tank & holding tank) were emptied by suction hose in 1979. Each sampling summary table must include locations of samples, ie. in Table 1-4 sample 04 corresponds to sediment in brook 100' above pond. All of the above information is provided in the enclosed sampling summaries and Site Description & History.

1-9 The finding of 2,700 PPB Vinyl Chloride in brook sediments is not mentioned. The conclusion that "the primary emphasis of the field investigation should be on volatile organics" is correct, however, the possibility of heavy metal contamination of the soils beneath and surrounding the pits must be considered. (see 3-19)

TABLE 3-1 Samples for VOAs should not be pH adjusted.

3-14 One Soil/Sludge sample must be taken from the holding tank at the side of the building and from any other pits discovered during clearing of area. Water standing in the tanks must be sampled if it is present.

3-16 One sediment sample should be taken at the inlet of the pond.

3-18 Decant water from sediment samples before transferring to

Comments from Fish & Wildlife are included.

Comments from QA/QC are included. Note: After reviewing 1984 samples we have found that the site was not, as we had thought, previously screened for PCB's, Dioxins and Pesticides (lab results were misleading). This means that we will need to do the full TCL on our first sampling round.

Please submit a schedule for these sampling activities with the revised FSP & QAPP.

Also enclosed you will find a Critical Path Analysis chart, graph and table. I have listed the tasks planned on this site and determined their most probable sequence. Please look carefully at the tasks assigned to "PRP" and advise me as to the accuracy of the estimated duration of these activities. If you have suggestions regarding the timing of the tasks, please let me know.

CPA Activities which have not been discussed previously include:

\*Existing wells survey: The Department of Health has decided not to take on this task, but our sampling efforts will be strengthened if we can sample wells either on the site or near it before finalizing the FSP. We also need this survey for the Risk Assessment.

Habitat Based Assessment: Suggested by our Fish & Wildlife Division and explained in the enclosed documents.

\*Survey Pits: We discussed the need to locate all existing pits. in order to predict contaminant migration we need to also describe the pathways of the connecting pipes and the design of the pits. (We don't really know where the leachate was designed to flow or whether the septic tanks and the leach pits are connected)

Determination of clean-up levels: We will want to define clean-up levels for each contaminant in each matrix in the schedule of work document and refine them (with guidance from our Technology Section) as data comes in. The Site Characteristics Fact Sheet needs to be completed once all analytical data has been recieved.

\* to be done prior to Field Sampling.

I also wanted to note a few items that should be included in your RI report:

The registry form for the site

A topo map indicating relative location of site.

Note that filling in or removal of all pits will be included in the final remedial action.

Please call me at (914) 255-5453 if you have any questions.

Sincerely,

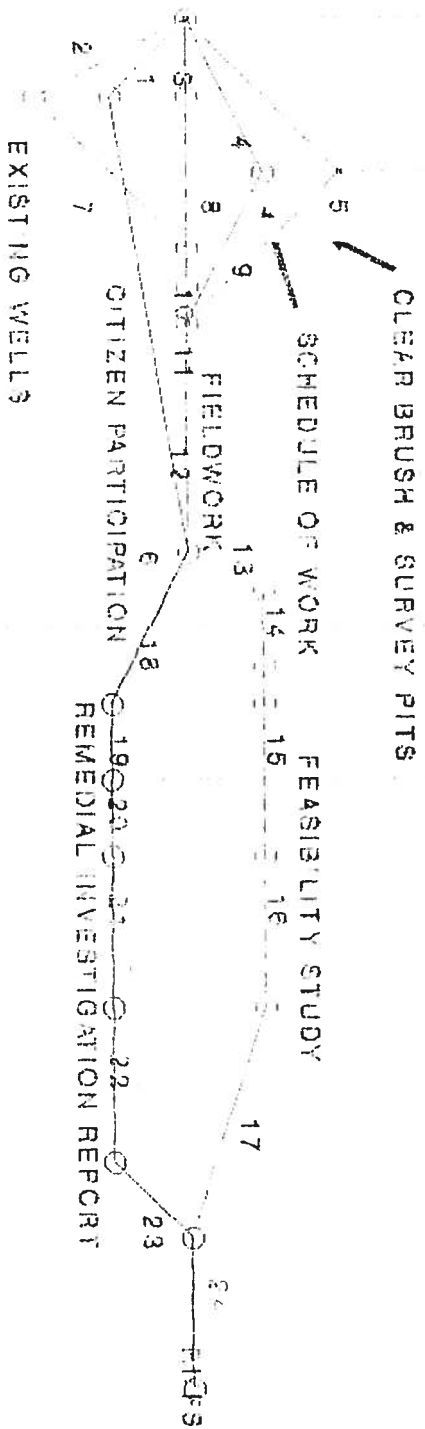
Molly Gallagher,  
DHWR, Reg. 3

MAGNA METALS  
NYSDEC SITE ID # 360003 Class 2  
EPA ID # NYD001394881

CRITICAL PATH ANALYSIS CHART  
TASKS PLANNED (NOT IN CHRONOLOGICAL ORDER)

	TASK	DURATION	WHO?
1	SUBMIT CITIZEN PARTICIPATION (CP) PLAN	2 WEEKS	PRP
2	SURVEY OF EXISTING WELLS IN AREA	2 WEEKS	PRP
3	SUBMIT COMMENTS ON FIELD SAMPLING PLAN (FSP) & QUALITY ASSURANCE PROJECT PLAN (QAPP)	2 WEEKS	DHWR
4	SUBMIT SCHEDULE OF WORK	4 WEEKS	PRP
5	CLEAR BRUSH & SURVEY PITS	1 WEEK	PRP
6	APPROVE CP PLAN	2 WEEKS	DHWR CPS
7	SAMPLE EXISTING WELLS	4 WEEKS	PRP
8	SUBMIT HABITAT BASED ASSESSMENT (HBA) WORKPLAN	4 WEEKS	PRP
9	APPROVE SCHEDULE OF WORK	2 WEEKS	DHWR
10	SUBMIT REVISED FSP, QAPP & HBA	1 WEEK	PRP
11	APPROVE FSP, QAPP & HBA	1 WEEK	DHWR
12	FIELDWORK	6 WEEKS	PRP
13	SITE CHARACTERISTICS FACT SHEET	1 WEEK	PRP
14	DETERMINE CLEAN-UP LEVELS	2 WEEKS	TECHNOLOGY SECTION
15	REMEDIAL ACTION SCOPING	1 WEEK	PRP, DHWR
16	SUBMIT FEASIBILITY STUDY	4 WEEKS	PRP
17	POSSIBLE INTERIM REMEDIAL MEASURE (IRM)	4 WEEKS	PRP
18	SAMPLE ANALYSIS/DATA VALIDATION	1 WEEKS	PRP
19	DATA EVALUATION	2 WEEKS	PRP
20	RISK ASSESSMENT	2 WEEKS	PRP
21	SUBMIT REMEDIAL INVESTIGATION (RI) REPORT	4 WEEKS	PRP

# Critical Path Analysis Magna Metals ID #360003



0	4	8	12	16	20	24	28	32	36
				WEEKS					